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DSL-BQA-97-044

To: Community-Based Residential Facilities

CBRF 16  
Staff 44

From: Judy Fryback, Director  
Bureau of Quality Assurance

### **Directions For Completing Applications For Training Program Approvals**

Attached are the materials for submitting applications for approval of training programs for staff of Community Based Residential Facilities (CBRFs). Please read the information contained in this memo and follow all directions when submitting applications for training program approval.

### **Regulatory Requirements**

Chapter 50.035(1) of the Wisconsin statutes states that each employee shall receive training in fire prevention and control and evacuation techniques and in first aid within the first 90 days of employment. This statute authorizes the department to indicate acceptable sources of training.

HFS 83.14(4) and (5) of the Wisconsin Administrative Code require that certain training plans for staff of CBRFs be approved by the Department. This section of the code includes the following key requirements.

The administrator and resident care staff need to receive 45 hours of initial training unless they meet the requirements for exemption also contained in this section of the code.

All initial training, except for fire safety, first aid, and universal/standard precaution, must be completed within 6 months of implementation. For staff employed before January 1, 1998, the initial training must be completed by June 30, 1998.

Training in universal precautions, now referred to as standard precautions, must occur prior to the employee assuming any job responsibilities which may occupationally expose the employee to blood or other potentially infectious material.

The administrator and all employees who work on the CBRF premises must successfully complete training in fire safety, and first aid and procedures to alleviate choking within 90 days after starting employment.

The administrator and all employees responsible for determining dietary needs, menu planning and food preparation must successfully complete 3 hours of training in these areas within the first 6 months of employment.

The administrator as well as any non-medically licensed staff member, who will manage or administer medications packaged by a pharmacist and who will not be under the supervision of a registered nurse or pharmacist, must successfully complete 8 hours of training in management and administration of medications before providing any medication assistance to residents.

### **Contents of a Complete Application**

A complete application will consist of :

- CBRF Training Program Approval Request (DSL-2415)
- Specific Training Module Approval Request Forms
- A Copy of the Training Program
- A Copy of the Certificate of Completion Given to the Student

The attached materials contain guidelines for each specific training module. These guidelines are a resource for the training program and the licensee. **They are not to be returned as part of the application.**

Training videos may be included as part of the training program(s). They may not serve as the entire training program. The use of videos must be accompanied by instruction from qualified instructors and must have a competency evaluation component that measures successful completion of the course. Training videos will not be returned. In lieu of submitting the actual video as part of the training program application, a complete transcript of the video may be submitted.

### **Training Blocks**

The training requirements, addressed in section HFS 83.14 of the administrative code, are placed into 3 training blocks identified as Training Blocks I, II, and III. Each Training Block contains specific training modules.

Hours of training are assigned for each module contained in the Training Block. A brief description of each Training Block follows below.

#### *Training Block I*

Training Block I consists of the training modules for Resident Rights, Recognizing and Responding to Challenging Behaviors, Client Group Specific Training, and Need Assessment and Individual Service Plan Development. The four training modules in Block I require a total of 32 hours of training time. There are recommended hours of training for each module in Training Block I, but the hours of training time are flexible to allow more time to be devoted to one module and less time to another module. All of the training elements in each module must be trained on regardless of the time allotted to the module. The allotment of the time to each module should be determined by such factors as the needs of the residents, including the number of different client specific groups served in the facility, the program of the facility, and the training needs of staff. All training elements in each module must be addressed in the training program.

#### *Training Block II*

Training Block II consists of the training modules for Fire Safety, First Aid and Procedures to Alleviate Choking, and Universal/Standard Precautions. The training time for each of these modules has been fixed based on existing programs. The Fire Safety training module requires 6 hours of training. The training module for First Aid and Procedures to Alleviate Choking requires 4 hours of training. The training module for Universal/Standard Precautions requires 3 hours of training. One, two or all of these modules may be trained on by a training program

*Training Blocks I and II represent the 45 hours of required initial training. The hours of training in Training Block III are only required for persons performing the functions.*

#### *Training Block III*

Training Block III consists of the modules for Management and Administration of Medications and Dietary Needs, Menu Planning, Food Preparation and Sanitation. The training time for these modules has been established in rule. The training module for Management and Administration of Medications requires 8 hours of training unless a facility's medication administration program is supervised by a pharmacist or registered nurse. The training module for Dietary Needs, Menu Planning, Food Preparation and Sanitation requires 3 hours of training.

The management and administration of medication training requirements under HFS 83.14(3)(a) and (b) specify two ways this training may be obtained. Both training requirements apply to the administrator and non-medically licensed staff members who will manage or administer medications. As noted above, this training must be provided before the administrator or staff member provides any help to a resident with prescribed or over-the-counter medications. The 8

hour requirement for a training program applies when the facility's medication administration program is not supervised by a pharmacist or a registered nurse. When a CBRF's medication program is supervised by a pharmacist, RN or prescribing practitioner (physician), HFS 83.14 authorizes them to provide the required training in the management and administration of medications and to determine the content and length of the program. The Department also reviews and approves these training programs.

*Please see the attached Instructions For Completing DSL-2415 CBRF training Program Approval Request or HFS 83.33(3)(e)3.a. to d. for further definition of the supervisor of a medication program.*

The training module for Dietary Needs, Menu Planning, Food Preparation and Sanitation requires 3 hours of training. The administrator and employees with these job responsibilities must successfully complete this training within 6 months of employment.

### **CBRF Training Approval Request**

The attached CBRF Training Program Approval Request form must be submitted as part of the complete application. The following key areas are included on the application.

**All programs submitted for approval are initial requests. Programs that have previously been approved by the department will need to submit new applications using the program elements contained in the attached guidelines.**

All programs need to identify the person authorized to accept official notices and to receive registered and certified mail.

All of the Training Block I modules must be trained on by the same training program and must consist of 32 hours of training.

A description of the policy for retaining the records of a training program must be included.

All programs need to develop and implement policies for avoiding cultural/sexual/racial bias in instruction and for making reasonable accommodations for students with handicapping conditions.

All training programs need to include a competency evaluation component. The competency testing methods may include written tests, oral tests, demonstration of competency, and other acceptable measurements of competency.

All training programs need to include the criteria and methods for evaluation of the overall effectiveness of the program, the maintenance of program standards, and the criteria for revising the program.

All training programs need to develop a process for reviewing complaints related to the program.

### **Instructor Qualifications**

HFS 83.14 (4) requires the department to approve the qualifications of trainers for programs that are provided by a CBRF. A major determinant in approving the qualifications of a trainer is the quality of the training program. It is important that approved programs are accessible to the staff of CBRFs. The department will use the following criteria in determining the adequacy of instructor qualifications.

The work experience of the instructor, as related to the topic of the training module, needs to be explicitly described. The description would include where the experience was obtained, the type of clients cared for, and the number of years of the work experience.

The description of the relevant education of the instructor, as related to the topic of the training module, should include where and when the education was obtained and the length of the course. Acceptable sources of relevant education would include workshops, special courses, and formal education courses from 2 and 4 year colleges.

The description of the training experience of each instructor would include a description of previously taught topics, where and when the topics were taught, and approximately how many students were involved.

Evidence of related professional licensure and certification should be submitted.

A qualified instructor may meet one or more of the above criteria. Again, the adequacy of the training program will be an important factor in determining adequacy of instructor qualifications.

Programs not affiliated with CBRFs are not required to submit the qualifications of instructors to the department for approval according to HFS 83. However, the department would appreciate receiving this information for purposes of maintaining demographic information. The department will request the qualifications of the instructors if the review of the training program indicates the information is necessary for determining approval. Additionally, the department will continue to require approval of instructor qualifications for fire safety and first aid training regardless of the training source, per Chapter 50.035(1).

### **Specific Training Module Approval Request Forms**

A complete application must contain the specific "Module Approval Request" form(s) for the specific module(s) being trained. Detailed explanation and instructions for completing the form are contained in the "Guidelines" for each training module. The module approval request form contains the element # for each training element that must be addressed in the training program and the locator for identifying where in the training program the training element is addressed. Each training element has a specific element #.

All Module Approval Request Forms identify the desired outcomes and attitudes the training programs must have as goals of training. The training elements specific to the topic of the training module are listed. The location of the training element in the training program needs to be identified in the locator column. An example of the identification of the location of the training element would be the page and paragraph number where the training element is addressed.

Some training programs will utilize training videos that contain the training element. If the training video is relatively short in length, example 10 minutes, the video may be identified by title. If the video is longer than 10 minutes, the specific segment of the training video must also be identified in the locator column. It is important to note that training elements contained in videos must be explicit enough to allow easy identification by both the student and the department reviewer.

### **Training Programs**

The basic training program needs to be submitted as part of the complete application. This may include the script, training outlines, reference books and videos. If a group of CBRFs or other training entities use the same videos or textbooks and a copy is on file at the department, the training resource may be referred to and not submitted with the application. All training element locations still need to be completed.

**Certificate of Completion**

Each student successfully completing an approved training program must be given a certificate of completion. The certificate of completion will contain the title of the approved training program, the approval number of the training program, the name of the instructor, the name of the student, the title of the training module(s) and the date of completion of the program.

**Application Approval Time**

The department will review applications based on a first come, first served basis. Incomplete applications will be returned to the applicant. It is important that all directions are carefully followed and applications are complete. Please send all your materials in via certified mail. This will ensure that you know your application has been received. Some training programs previously submitted applications to the department. All of the applications need to be resubmitted using the attached forms. The department will continue to use the Educational Teleconferencing Network (ETN) for updates. Please attend these if at all possible.

**Previously Approved Fire Safety and First Aid and Procedures to Alleviate Choking Programs**

Fire safety and first aide programs, previously approved by the department, will need to submit new applications for training program approval using the attached application materials. Previously, the department has made available training materials for the fire safety programs. All of these training materials will no longer be current as of January 1, 1998. The attached guidelines for fire safety training replace these materials. Programs will need to provide their own certificates of completion for students successfully completing the program.

The bureau has received inquiries regarding the currency of qualifications of instructors of fire safety programs who have completed the "train the trainer" course offered by the Wisconsin Technical College System. The department will consider the qualification as current. However, all instructors are responsible for maintaining their current knowledge base and training proficiency.

**Previously Reviewed Drafts of Training Materials**

The department, previous to this mailing, has released drafts of training materials in order to secure input into the training approval process. All of these drafts should be destroyed as changes to all forms have been made. Any applications submitted, using previously distributed forms, will be returned to the applicant.

**Training Program Availability and Targeted Audience**

The department will be issuing a listing of approved programs with contact person, telephone number and address. Information on the availability of these programs to other interested parties will be included. When submitting an application, please answer the questions on the CBRF Training Program Approval Request form located under Targeted Audience.

The availability of sufficient medication administration training programs before and on January 1, 1998, may be problematic for a short period of time.

The department will consider a reasonable amount of time after January 1, 1998 for facilities to obtain this very necessary training. All CBRFs must actively seek out training resources, including being involved in the creation of training resources, in order to be considered as making a "good faith" effort to provide or obtain this training. Facility compliance will be reviewed on an individual basis. It is important that CBRFs develop a plan for obtaining training and implement it.

**Portability of Training**

The initial training required in HFS 83.14 of the administrative code is referred to as "initial training." Therefore, a person who successfully completes an approved training program, is considered to have met the training requirement. Approved training is considered "portable" to other CBRFs that serve the same client groups. However, it is imperative that the employer review the training the employee has received to determine adequacy in relation to meeting the client/program needs of the facility.

**Purchase of Additional Application Materials**

Attached application materials may be copied or may be purchased from the department. Please see the attached directions.

Attachment